

# Amended 324 Building Closure Plan

## Responsiveness Summary



Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Blvd.  
Richland, WA 99354

April 20, 2006

Publication Number: 06-05-005

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## RESPONSIVENESS SUMMARY

Prepared by:

Jeanne Wallace

Washington State Department of Ecology

Nuclear Waste Program

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Publication Number: 06-05-005

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## **Introduction**

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The Washington State Department of Ecology (Ecology) invited public comment on the amended 324 Building Closure Plan. The plan proposes clean closure of the Hanford 324 Building by removing mixed waste units during facility decommissioning and demolition. If clean closure is not possible, the building will be placed in post closure care status. A 45-day public comment period ran January 17, 2006 through March 6, 2006. A public hearing was not requested during the comment period.

The following responsiveness summary provides Ecology's response to comments received during that period.

## **Responsiveness Summary**

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### **Comment 1**

By leaving this building until the above date, loss of institutional knowledge about this very complex structure is sure to be severely eroded. Any of the 300 Area buildings of this type are likely to fall into this category as well.

As-built drawings and a lack of precise records for the exact activities that took place in this building are a couple of the reasons for my concerns. "Need to know" policies and the classified nature of most of the work that occurred in 324 prevent anyone from being certain of all the hazards that may be associated with cleaning it out. Experienced and knowledgeable workers will be at enough risk, never mind turning D & D over to a group of workers who have no clue about it.

If, indeed, the state agrees to this delay, there should be a very concerted effort to capture all institutional knowledge of the associated hazards, the acquisition of up dated drawings with verifications, and a catalogue of all of the foregoing, copied to state records as well as DOE records.

### **Response to Comment 1**

Thank you for your comment. Your input is important to the Department of Ecology as we make decisions about how to clean up the Hanford Site.

The loss of institutional knowledge is a legitimate concern. First let us clarify that the closure plan only addressed portions of the 324 building that managed regulated dangerous waste without a permit, not the entire building. The closure plan originally was issued to close the waste management portions of the

building. The rest of the building was to be placed in surveillance and maintenance phase until demolition occurred.

Demolition will now occur sooner. Significant engineering efforts and craft training are underway to allow facility cleanout. We have switched from keeping the building open beyond 2010, with cleaned out cells, to an accelerated demolition of the building. The early demolition in fact allows us to use the existing, knowledgeable crew to demolish the building. Demolition of the facility by 2010 is already required by TPA milestone M-94

The closure plan and associated milestone are being modified to coordinate closure activities with the removal of 324 building. Demolition of the facility was already required by TPA milestone M-94. The entire building is to be decontaminated and decommissioned in accordance with an Environmental Protection Agency, Engineering/Cost Analysis (EE/CA) #2 for the 300 Area, DOE/RL-2005-84, revision 0.

## **Comment 2**

These 2 (the Closure Plan announcement ran concurrently with a TPA Change Package) seem so tied together I cannot understand the calling for separate comments. Without understanding such need, is not possible to frame my comments and know where to send them.

On the surface, it seems that circumstances have presented a “fiat accompli” and the definitions and schedules must be amended. That would leave open an assessment of the cascading effect on the rest of the program and the cost impacts.

## **Response to Comment 2**

Thank you for your comment. Your input is important to the Department of Ecology as we make decisions about how to clean up the Hanford Site. Your interpretation of the material was very accurate. The documents are not independent of one another. However, they fall into separate regulatory categories. The 324 Closure Plan is permitted by Ecology, while the decision to change the Tri-Party Agreement (TPA) is decided by all the TPA Agencies.

The 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Closure Plan is a dangerous waste storage facility (treatment, storage, and/or disposal (TSD) unit) that requires a permit to close in accordance with the Washington State Dangerous Waste regulations. In order to schedule, prioritize, and coordinate regulatory activities milestones, such as M-89, are established and incorporated into the TPA. In other words M-89 was the

compliance scope and schedule that lead to the development and implementation of the closure plan.

The budgetary and program concerns you raise are legitimate. First let us clarify that the closure plan only addressed portions of the 324 building that managed regulated dangerous waste without a permit, not the entire building. The closure plan originally was issued to close the waste management portions of the building. The rest of the building was to be placed in surveillance and maintenance phase until demolition occurred.

The closure plan and associated milestone are being modified to coordinate closure activities with the removal of 324 building. Demolition of the facility was already required by TPA milestone M-94. The entire building is to be decontaminated and decommissioned in accordance with an Environmental Protection Agency, Engineering/Cost Analysis (EE/CA) #2 for the 300 Area, DOE/RL-2005-84, revision 0. The idea is to drive down the cost of cleanup and minimize exposure of cleanup personnel by addressing the entire building once.

### **Comment 3**

It is important to cleanup the 324 building as soon as possible.

### **Response to Comment 3**

We agree. That is why we are changing the closure plan to complete decommissioning and demolition activities at the same time the regulated parts of the facilities are removed. Initially, the building was to remain standing after removal of those portions of the building.

## **Summary of Public Involvement Actions**

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In accordance with Washington Administrative Code (WAC) 173-303-840(3), public review of the documents lasted 45 days. The public review started January 17, 2006, and ended March 6, 2006. A public hearing was not requested during the comment period. Ecology published the materials on the internet at <http://www.ecy.wa.gov/programs/nwp/> at the onset of the comment period. A mailer was sent out a week before the comment period to the TPA highly interested mail list. A notification was sent via the TPA email list 30 days prior to the start of the comment period.

The public comment period package included the following:

- A copy of the Milestone M-89-00 Tentative Agreement and Revised Change form
- Fact Sheet Regarding M-89-00 Tri-Party Agreement Milestone and Amended 324 Building Closure Plan
- 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Closure Plan, DOE/RL-96-73, Revision 3
- Determination of Non-significance for the 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas

## **Attachments**

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Electronic message from Keith Smith to Ginger Wireman, November 29, 2005.

Memorandum from Allan Panitch to Jeanne Wallace, January 18, 2006

Electronic message from Don Stephens to Ginger Wireman, December, 2005.

Fact Sheet

Legal Ad

Final letter of decision

**Comment 1**

November 29, 2005

Dear Ms. Wireman,

My concern with leaving this building until 2010 for final disposition is as follows:

By leaving this building until the above date, loss of institutional knowledge about this very complex structure is sure to be severely eroded. Any of the 300 Area buildings of this type, are likely to fall into this category as well.

As-built drawings and a lack of precise records for the exact activities that took place in this building are a couple of the reasons for my concerns. "Need to know" policies and the classified nature of most of the work that occurred in 324 prevent anyone from being certain of all the hazards that may be associated with cleaning it out. Experienced and knowledgeable workers will be at enough risk, never mind turning D & D over to a group of workers who have no clue about it.

If, indeed, the state agrees to this delay, there should be a very concerted effort to capture all institutional knowledge of the associated hazards, the acquisition of up dated drawings with verifications, and a catalogue of all of the foregoing, copied to state records as well as DOE records.

Please do keep these issues in mind when formulating the final agreement concerning this proposed delay.

Sincerely,  
Keith Smith  
2825 W Grand Ronde Ave  
Kennewick, WA 99336

**Comment 2**  
(Allen Panitch Memo)



# SPEEDY MEMO

Allan Panitch  
P O Box 99387  
Seattle WA 98199

206 282 8541

TO Jeanne Wallace

AT

SUBJECT Amend 324 / 14-89-00 Change Package

DATE 1/18/06

These 2 seem so tied together I cannot understand the calling for separate comments.

Without understand such need, it is not possible to frame my comments & know where to send them.

On the surface, it seems that circumstances have presented a "fait accompli" and the definitions & schedules must be amended.

That would leave open an assessment of the cascading effect on the rest of the program and the cost impacts.

RETURN TO

SIGNED

Allan Panitch

DATE

SIGNED

990-15191

**Comment 3**

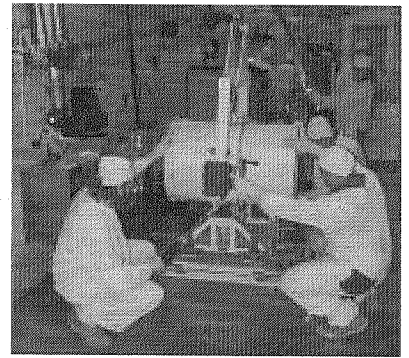
From: Don Stephens [[mailto:Don\\_Stephens@pmug.org](mailto:Don_Stephens@pmug.org)]  
Sent: Thursday, December 01, 2005 5:28 PM  
To: Wireman, Ginger  
Subject: Cleanup 324 building ASAP

It is important to  
cleanup the 324 building as soon as possible.

## FACT SHEET

Regarding

# Proposed Changes to the M-89-00 Tri-Party Agreement Milestone and Amended 324 Building Closure Plan



The Tri-Party Agreement (TPA) agencies – U.S. Department of Energy (USDOE), U.S. Environmental Protection Agency, and the Washington State Department of Ecology – want your feedback on the proposed changes to the TPA M-89-00 milestone.

The Washington State Department of Ecology (Ecology) welcomes comments on the Amended 324 Building Closure Plan for the Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault and other areas of the facility.

A 45-day comment period on the 324 Closure Plan and the associated changes to the M-89-00 milestone will run concurrently from January 17 to March 6, 2006.

## Your Input Requested January 17 to March 6, 2006

### Background and Proposed Changes

#### Amended 324

#### 1. Building Closure Plan

The Hanford Site, located near Richland, Washington, is operated by the U.S. Department of Energy, Richland Operations Office. The 324 Building is located in the 300 Area of the Hanford Site. The 324 Building was constructed in the 1960s to support materials and chemical process research and development activities ranging from laboratory/bench-scale studies to full engineering-scale pilot plant demonstrations.

In the mid-1990s, it was determined that dangerous waste and waste residues were being stored for more than 90 days in the 324 Building Radiochemical Engineering Cells (REC) and the High-Level Vault/Low-Level Vault (HLV/LLV) tanks without a permit as required by the *Washington State Dangerous Waste Regulations (WAC 173-303)*. In response USDOE and Ecology agreed that regulated closure of the unit was the most appropriate response.

Clean closure will be achieved by removing the mixed waste units during facility decommissioning and demolition activities. However, if clean closure is not possible, post closure care will be implemented.

#### Changes to the

#### 2. M-89-00 TPA Milestone

The current TPA milestone M-89-00 required that the non-permitted mixed waste units in the 324 building be closed by October 31, 2005. This summer the TPA agencies participated in a series of discussions to determine how to best sequence the facility clean closure activities with facility demolition activities. The proposed change to the milestone would extend the closure schedule to align with the facility demolition schedule.

In October 2001, the Parties signed a change request that required the demolition of the 324 building by September 30, 2010. The Parties subsequently agreed that it made more sense to achieve clean closure in 2010 when the building is demolished.

Tri-Party Agreement Milestone M-094-03 was established in April 2002 and requires complete disposition of the 324 Building by September 30, 2010. The Tri-Party Agreement Major Milestone M-89-00 workscope is a parallel activity with Interim Tri-Party Agreement M-094-03 workscope. Therefore the due date for M-89-00 is being changed from October 31, 2005 to September 30, 2010 to align with the M-094-03 due date.

## How can I become involved?

A 45-day public comment period on the Closure Plan and Proposed TPA Milestone changes will be held from January 17 through March 6, 2006. Ecology will collect comments on the 324 Closure Plan documents, and USDOE will collect comments on the Change Package. We will consider all comments before the documents are finalized. No public meeting for either decision is scheduled at this time. To schedule a public meeting contact the appropriate agency (on reverse). For more information contact us through the Hanford Cleanup Line at 800.321.2008.

During the comment period, the draft closure plan and associated documents are available for public review Monday – Friday, 9 a.m. – 12 p.m. and 1 p.m. – 4 p.m., at the Department of Ecology Nuclear Waste Program Library, located at 3100 Port of Benton Blvd, Richland, Washington. To make an appointment to review the documents call 509.372.7920. They may also be viewed at one of the public information repositories listed on the reverse side, or online at [www.hanford.gov/public/calendar](http://www.hanford.gov/public/calendar) under the Public Comments section.

To request a hard copy or CD of the Closure Plan and/or proposed TPA Milestone changes call the Hanford Cleanup Line 800.321.2008.



Washington State Dept. of Ecology  
Nuclear Waste Program  
3100 Port of Benton Blvd.  
Richland, WA 99354

## TPA & ECOLOGY FACT SHEET

PRSRT STD  
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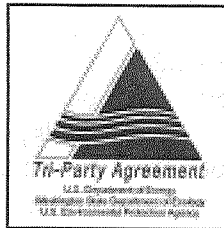
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### Where do I send my comments?

#### **AMENDED 324 BUILDING CLOSURE**

Submit comments on the  
**324 Building Closure Plan**  
to  
**Jeanne Wallace**  
**Washington State Dept. of Ecology**  
**3100 Port of Benton Blvd.**  
**Richland, WA 99354**  
or email:  
**jewa461@ecy.wa.gov**



#### **M-89-00 CHANGE PACKAGE**

Submit comments on the  
**M-89-00 TPA Milestone**  
to  
**Rudy Guercia, USDOE**  
**PO Box 550, MS A3-04**  
**Richland, WA 99352**  
or email:  
**Rudolph\_F\_Rudy\_Guercia@RL.gov**

*If you require special accommodations or need this document in an alternate format, please contact the Nuclear Waste Program at 509.372.7883. For persons with a speech or hearing impairment call 711 for relay service or 800.833.6388 for TTY.*

**Ecology Publication #05-05-010**

### Where else can I view the documents?

<http://www.hanford.gov/public/calendar> under the **Public Comments** section,  
or at the public repositories listed below.

#### **Portland**

Portland State University  
Branford Price and Miller Library  
934 SW Harrison  
Attn: Judy Andrews (503) 725-4126

#### **Spokane**

Gonzaga University  
Foley Center  
East 502 Boone  
Attn: Linda Pierce (509) 323-6110

#### **Seattle**

University of Washington  
Suzzallo Library  
Government Publications Division  
Attn: Eleanor Chase (206) 543-4664

#### **Richland**

U.S. Department of Energy Public Reading Rm.  
Consolidated Information Center, Room 101-L  
2770 University Drive  
Attn: Janice Parthree (509) 372-7443

## **Text for Legal Ad**

### **Public Comment Requested on the 324 Building Closure Plan and the Associated TPA Change Package**

Public comments are invited from Jan. 3-Feb. 17, 2006 on the Hanford 324 Building Closure Plan and Associated TPA Change Package

Located in the 300 Area of the Hanford Site, the 324 Building was built in the 1960s to support materials and chemical process research and development activities.

In the mid-1990s, it was determined that dangerous waste and residues were being stored for more than 90 days in the 324 Building Radiochemical Engineering Cells (REC) and the High-Level Vault/Low-Level Vault (HLV/LLV) tanks without a permit as required by the *Washington State Dangerous Waste Regulations (WAC 173-303)* or the federal *Resource Conservation and Recovery Act of 1976 (RCRA)*. That determination necessitated a regulated closure.

The path for closure and the performance standard was changed to performing "removal" instead of cleaning to meet the Debris Rule standard, "clean debris surface", for clean closure. Clean closure will be achieved by removing the mixed waste units during facility decommissioning and demolition activities. However, if clean closure is not possible, closure surveillance and maintenance activities will be implemented.

TPA Milestone M-89-00 requires that the non-permitted mixed waste units in the 324 building be closed by October 31, 2005.

Cell liners and concrete were to be decontaminated to meet "Alternative Treatment Standards for Hazardous Debris". All in-cell waste, accessible piping, and eight tanks were to be removed. Integrity assessments were to be performed on the cells to verify soil and groundwater had not been contaminated by the TSD unit

In October 2001, the Parties signed a change request that required the demolition of the 324 building by September 30, 2010. The Parties subsequently agreed that it made more sense to achieve clean closure in 2010 when the building is demolished.

Tri-Party Agreement Milestone M-094-03 was established in April 2002 and requires complete disposition of the 324 Building by September 30, 2010. The Tri-Party Agreement Major Milestone M-89-00 workscope is a parallel activity with Interim Tri-Party Agreement M-094-03 workscope. Therefore the due date for M-89-00 is being changed from October 31, 2005 to September 30, 2010 to align with the M-094-03 due date.

These separate comment periods will run concurrently from January 3 through February 17, 2006. No Public Hearing is planned at this time.

The permittee is the United States Department of Energy, P.O. Box 550, Richland, Washington 99352, Richland, Washington, 99352.

During the comment period, the draft closure plan and associated documents are available for public review Monday – Friday, 9 a.m. – 12 p.m. and 1 p.m. – 4 p.m., at the Department of Ecology Nuclear Waste Program Library,

located at 3100 Port of Benton Blvd, Richland, Washington. To make an appointment to review the documents, call (509) 372-7920. The documents are also available for public review at the Department of Ecology Nuclear Waste Program web site, [www.ecy.wa.gov/programs/nwp](http://www.ecy.wa.gov/programs/nwp) by following the comment period link.

For more information or to request a public hearing, please call the Hanford Cleanup Line at (800)321-2008.



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

April 24, 2006

Mr. Keith A. Klein, Manager  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

Re: Notice of Final Decision on the Amendment to the *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Area Closure Plan, Revision 3*

Dear Mr. Klein:

The Department of Ecology invited public comment on the amended 324 Building closure plan. The draft plan proposes clean closure of the 324 Building radiochemical engineering cells, high-level vault, low-level vault, and other associated areas of the facility by removing mixed waste units during facility decommissioning and demolition. If clean closure is not possible, the building will be placed in post-closure care status. A 45-day public comment period ran January 17, 2006 through March 6, 2006. A public hearing was not requested during the comment period.

Ecology has completed the public involvement process for the 324 Building radiochemical engineering cells, high-level vault, low-level vault, and other associated areas of the facility closure plan. The comments received will not require further modifications to the document. Therefore, the amended closure plan will be issued as presented for public review. The final decision will become effective 30 days after issuance of this notice.

If you have any questions, contact me at 509-372-7931.

Sincerely,

A handwritten signature in cursive script that reads "Jeanne Wallace".

Jeanne Wallace  
Nuclear Waste Program

JW:pll  
Enclosure  
cc: See next page



Mr. Keith A. Klein  
April 24, 2006  
Page 2

cc w/enc:

Rudolph Guercia, USDOE  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Todd Martin, HAB  
Ken Niles, ODOE  
Administrative Record  
Environmental Portal